

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

STREAM TV NETWORKS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10763 (MDC)

STREAM TV NETWORKS, INC. and
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

Adv. Case No. 23-00057 (MDC)

SHADRON L. STASTNEY, SLS HOLDINGS
VI, LLC, HAWK INVESTMENT HOLDINGS
LIMITED, ARTHUR LEONARD ROBERT
“BOB” MORTON, SEECUBIC, INC.,
ALASTAIR CRAWFORD, KRZYSZTOF
KABACINSKI, KEVIN GOLLOP, ASAF
GOLA, JOHN DOE(S),

Defendants.

**HAWK INVESTMENT HOLDINGS LIMITED’S
NOTICE REGARDING OCTOBER 6, 2023, HEARING**

Hawk Investment Holdings, Ltd. (“Hawk”) hereby files this Notice pursuant to the Court’s October 3, 2023, *Order Scheduling an Expedited Hearing on Debtors’ Motion for a Temporary Restraining Order* [AP ECF No. 33], setting forth its position that the Court can schedule the October 6, 2023 hearing by telephonic means on the *Debtors’ Motion for a Temporary Restraining Order* [AP ECF No. 30] (the “TRO Motion”). In the TRO Motion, the

¹ The Debtors, along with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The Debtors’ service address is 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

Debtors have failed to plead any factual allegations of wrongdoing or conduct by Hawk, so there are no disputed facts that will require evidence at the hearing with respect to Hawk.²

Accordingly, Hawk does not intend to put forth any documents or witnesses as it relates to the Debtors' failure to set forth any specific claim or factual allegation respecting Hawk or actions taken by Hawk sought to be enjoined. Notwithstanding the foregoing, Hawk expressly reserves the right to rely on any exhibits, declarations, or testimony, to cross-examine witnesses or declarants, or to challenge the Declarations of Mathu Rajan and Bud Robertson (attached as exhibits to the TRO Motion) or alleged facts asserted therein, entered, or adduced during the hearing, or otherwise. Hawk reserves the right to impeach any declarants or other witnesses offered by any other party as well.

Nothing herein shall be construed as a waiver of any defense or claim Hawk may have with respect to the Complaint, including, but not limited to, any defense to the form, type, and procedure related to service of process. Hawk reserves all rights with respect to any answer, response, motion, or claim it may make in response to the Complaint, including with respect to service of process and personal jurisdiction.

² Hawk also notes that even based on the allegations in the TRO Motion, the Plaintiffs have not established any basis for personal jurisdiction over Hawk or the other foreign defendants, including at least, Arthur Leonard Robert "Bob" Morton, Alastair Crawford, Krzysztof Kabacinski, and Kevin Gollop.

Dated: October 4, 2023

K&L GATES LLP

/s/ Steven L. Caponi

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CERTIFICATE OF SERVICE

I, Steven L. Caponi, certify that on October 4, 2023 I caused a copy of the forgoing *Hawk Investment Holdings Limited's Notice Regarding October 6, 2023, Hearing* to be served on those persons receiving notice through CM/ECF.

/s/ Steven L. Caponi
Steven L. Caponi (No. 91881)